

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: Higinio Mora

Debtor(s)

BankUnited N.A.

Movant

vs.

Higinio Mora

Respondent(s)

BK NO. 23-11529 PMM

Chapter 13

Hearing Date: 10/05/2023

**OBJECTION OF BANKUNITED N.A.
TO CONFIRMATION OF CHAPTER 13 PLAN**

BankUnited N.A. (hereinafter Secured Creditor), objects to confirmation of Debtor's Chapter 13 plan and asserts in support of its Objection as follows:

1. On June 23, 2023, Secured Creditor filed a secured proof of claim setting forth pre-petition arrears in the amount of \$58,386.90.
2. Debtor's Plan provides for payment in the amount of \$33,000.00 towards the arrearage claim of the Secured Creditor.
3. Debtor's Plan understates the amount of the Secured Creditor's claim by \$25,386.90, and does not provide sufficient funding to pay said claim including present value interest.
4. Accordingly, Debtor's Plan is not feasible, as it does not fully compensate the Secured Creditor.
5. In addition, the Debtor's Plan fails to comply with 11 U.S.C. §§ 1322 and 1325.

WHEREFORE, the Secured Creditor, BankUnited N.A., prays that the Court deny confirmation of the Debtor's Plan.

Respectfully submitted,

Date: September 26, 2023

By: /s/Denise Carlon

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